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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Petition of U S WEST Communications, Inc.)
for a Declaratory Ruling Regarding the)
Provision of National Directory Assistance)

CC Docket No. 97-172

REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.

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September 17, 1997

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SUMMARY

In this proceeding, U S WEST Communications, Inc. ("U S WEST"), has asked the Federal Communications Commission ("Commission" or "FCC") to rule that U S WEST's provision of National Directory Assistance does not violate the Communications Act of 1934. AT&T Corp. ("AT&T") and MCI Telecommunications Corporation ("MCI") claim the contrary, that the Act prohibits the Bell Operating Companies ("BOC") from providing such a service, or that it prohibits them from providing the service on an efficient, centralized basis, or that it prohibits them from using the "411" access code to provide the service.

U S WEST demonstrated the error of these arguments in its Petition herein, and we make that showing again here. National Directory Assistance is not an "interLATA service," as the Communications Act defines that term. Providing that service on a centralized (interLATA) basis is not the provision of interLATA service. In any case, the Modification of Final Judgment ("MFJ") Court approved the BOCs' provision of any lawful directory assistance by means of interLATA official services, so that this activity is previously-approved and thus permitted under Section 271(f) of the Act. Neither AT&T nor MCI has presented any good reason to deny the BOCs the use of the "411" access code to provide this service.

Apparently realizing the weakness of its own arguments, AT&T asserts that, in any event, U S WEST must provide National Directory Assistance in conformance to the interconnection requirements of Section 251. As we will show, U S WEST will do just that.

These Reply Comments thus demonstrate that the arguments of AT&T and MCI provide no justification to deny U S WEST's customers the convenience of this valuable service. The Commission should reject the protectionist arguments of AT&T and MCI and affirm U S WEST's right to provide National Directory Assistance.

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REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.

In these Reply Comments, U S WEST Communications, Inc. ("U S WEST") will focus on the Comments of MCI Telecommunications Corporation ("MCI") and AT&T Corp. ("AT&T"), both of whom argue that U S WEST's provision of National Directory Assistance violates the Communications Act of 1934. We will demonstrate that the Act does not prohibit the provision of National Directory Assistance, whether on a centralized (interLATA) or decentralized basis, and it does not prohibit the use of the "411" access code for that service. We will also show that U S WEST's provision of National Directory Assistance will meet the requirements of Section 251 of the Communications Act.¹

¹ When U S WEST filed its Petition herein, it noted that it was providing National Directory Assistance in Colorado and New Mexico. Since that filing, U S WEST has begun to provide the service, pursuant to state commission approval, in Arizona, Idaho, Utah and Washington; it has received commission approval to provide the service in Montana and Wyoming, and will soon offer it in those states. In the next few months, U S WEST will seek state commission approval to provide National Directory Assistance in its remaining states, and it hopes to have the service available in all fourteen of its states by the end of 1997. U S WEST's Petition for Declaratory Ruling filed July 17, 1997 ("Petition").

As an initial matter, we note that AT&T and MCI place great reliance on the argument that Judge Greene would, if asked, have ruled that U S WEST's provision of National Directory Assistance violated the Modification of Final Judgment ("MFJ").² Whatever the truth of this assertion, it is fundamentally irrelevant. The Commission must here interpret a statute, not a judicial decree, and that statute varies dramatically in a number of material respects from the MFJ. The Telecommunications Act of 1996 reflects the will of Congress, not the rulings of a court. Thus, in examining U S WEST's National Directory Assistance, the Commission must look to the statutory language and the intent of Congress as expressed by that language. Speculation as to what a court might have said in interpreting a defunct judicial decree has no value and no place in this proceeding, except where Congress has expressly incorporated aspects of that decree into the statute.

I. SECTION 271 DOES NOT PROHIBIT A BELL OPERATING COMPANY ("BOC") FROM PROVIDING NATIONAL DIRECTORY ASSISTANCE.

Alone among the commenters, MCI claims that, regardless of anything else, merely providing a directory assistance customer with a telephone number from outside the LATA from which that customer calls is the provision of interLATA service.³ MCI is demonstrably wrong.

² United States v. Western Electric Co., 552 F.Supp. 131 (D.D.C. 1982), aff'd sub nom. Maryland v. United States, 460 U.S. 1001 (1983). The Consent Decree resulting from this litigation was subsequently terminated. See Order, Civil Action No. 82-0192 (D.D.C. Apr. 11, 1996).

³ MCI at 1, 3-4.

In its Petition, U S WEST explained that Section 271 of the Act prohibits a BOC from providing “interLATA service,” which the Act defines as interLATA telecommunications. “Telecommunications,” in turn, is –

the transmission between or among points specified by the user, of information of the user’s choosing, without change in the form or content of the information as sent and received.⁴

An “interLATA service” is thus simply the interLATA transmission of information specified by the user between points specified by the user. Providing a telephone number, regardless where the subscriber associated with that telephone number might reside, does not meet that definition.⁵

MCI attempts to refute this plain showing by arguing that the interLATA restriction encompasses more than simply carrying interLATA transmissions, citing the example of a BOC’s marketing interLATA services, an act MCI claims is prohibited by the interLATA restriction.⁶ In support, MCI cites Section 272(g)(3) of the Act, which supposedly authorizes a BOC to engage in the “joint marketing and sale” of intra- and interLATA services. That provision would be unnecessary, says MCI, if this joint marketing activity were not prohibited by Section 272(a)(2), which requires a BOC to utilize a separate affiliate to provide certain interLATA services. MCI therefore claims that, because the provision of interLATA services (as referred to in Section 272(a)(2)) must include marketing such services, the parallel reference

⁴ 47 U.S.C. § 153(43).

⁵ Petition at 6-7.

⁶ MCI at 11-12.

in Section 271 must also include the marketing of interLATA services.⁷ Therefore, we are told, the prohibition against providing interLATA services must incorporate more than merely transmitting information across LATA boundaries, and the Commission must interpret the prohibition to determine its exact scope. MCI is wrong.

To begin, MCI has mischaracterized Section 272(g)(3). Contrary to MCI's assertions, that provision does not "authorize" any joint marketing activities.

Rather, it merely states that –

The joint marketing and sale of services permitted under this subsection shall not be considered to violate the nondiscrimination provisions of [Section 272(c)].

In this context, "this subsection" is Section 272(g), a point that becomes obvious upon examination of Sections 272(g)(1) and (2). Subsection (1) prohibits an interLATA affiliate from marketing and selling its affiliated BOC's local service unless the BOC permits others to do the same. More to the point, subsection (2) states:

A Bell operating company may not market or sell interLATA service provided by an affiliate required by this section within any of its in-region States until such company is authorized to provide interLATA services in such State under section 271(d).

Thus MCI has it exactly backwards. No provision of Section 272(g) – and certainly not Section 272(g)(3) – authorizes a BOC to engage in the joint marketing of local and interLATA service. Section 272(g)(2) indeed prohibits a BOC from marketing some – but not all – interLATA services prior to its receipt of Section 271

⁷ Id. at 12.

authorization.⁸ If Section 272(g) establishes anything in this regard, it is that Section 271 does not prohibit a BOC from marketing and selling interLATA services.⁹ If it were otherwise, Section 272(g)(2) would be wholly unnecessary: Section 271 would already prohibit the very conduct that Section 272(g)(2) addresses.

But even if MCI were correct, its argument would prove nothing of relevance to this proceeding. The issue here is whether National Directory Assistance is an interLATA service, not whether U S WEST is providing that service. In essence, MCI has tried (and failed) to show that “provide” – a term not defined in the Act – should be given an expansive reading. Whatever the outcome of that, the definition of “provide” says nothing about the meaning of “interLATA service,” which the Act defines very precisely. And U S WEST is in violation of Section 271 only if it is providing (however defined) an interLATA service.

MCI knows full well that the Act cannot reasonably be interpreted to prohibit a BOC from providing out-of-LATA telephone numbers. It thus attempts to focus

⁸ Thus the joint marketing activities “permitted” (not “authorized”) by Section 272(g) are those not prohibited by Sections 272(g)(1) and (2).

⁹ The Commission reached virtually that same conclusion in interpreting Section 275(a)(1) of the Act, which prohibits a BOC from “engag[ing] in the provision of alarm monitoring services” for a specified period. The Commission determined that this provision did not “necessarily” preclude a BOC from participating in sales agency and marketing activities in connection with alarm monitoring. Rather, the Commission will look at the entire circumstances of the arrangement to determine whether the BOC’s interests “are so intertwined with the interests of an alarm monitoring service provider that the BOC itself may be considered to be ‘engag[ed] in the provision’ of alarm monitoring.” In the Matter of Implementation of the Telecommunications Act of 1996: Telemessaging, Electronic Publishing, and Alarm Monitoring Services, Second Report and Order, 12 FCC Rcd. 3824, 3841 ¶ 38 (1997).

the Commission's attention on the MFJ, which did prohibit such activities. But the MFJ is dead and buried; Section 601(a)(1) of the Telecommunications Act of 1996 expressly did away with it, and conduct that was subject to the MFJ is now subject to the Act.¹⁰ Because of the differences between the MFJ's interLATA prohibition and the Act's interLATA restriction, the former simply has no bearing on interpreting the latter.¹¹

AT&T argues that the Act and the MFJ must prohibit the same conduct because both of their interLATA restrictions use the word "service."¹² Indeed, Section II.D.1 of the MFJ prohibited a BOC from providing "interexchange [interLATA] telecommunications services," while Section 271(a) of the Act prohibits a BOC from providing – prior to its receipt of Section 271 authorization – "interLATA services." But as we noted in the Petition, the Act and the MFJ define these respective terms, and they define them quite differently. AT&T might choose to ignore the differences between the MFJ and the Act, but the Commission cannot.

AT&T's appeal to the legislative history of the Telecommunications Act of 1996 is likewise unavailing.¹³ First, the Commission has no need to consult the legislative history: the Act is straightforward and unambiguous in this regard. Second, AT&T can point to no legislative history demonstrating that Congress intended that "interLATA service" should incorporate the MFJ's meaning of

¹⁰ 47 U.S.C. § 152(a)(1).

¹¹ Petition at 7-9.

¹² AT&T at 12-13.

¹³ Id. at 10-11.

“interLATA telecommunications service.” Indeed, AT&T’s point seems to be the absence of any meaningful legislative history, as though that proves anything.¹⁴

When Congress intended to incorporate into the 1996 Act a definition from the MFJ it expressly did so, either by repeating or paraphrasing the definition in the Act,¹⁵ or by simply incorporating the definition by express reference.¹⁶ In this case, however, Congress gave “interLATA service” a definition quite different from the MFJ’s definition of “interLATA telecommunications service.”

U S WEST’s Petition demonstrated that nothing in the Act prohibits U S WEST from providing National Directory Assistance. The arguments of MCI and AT&T do not contradict that showing.

II. THE COMMUNICATIONS ACT DOES NOT PROHIBIT U S WEST FROM PROVIDING NATIONAL DIRECTORY ASSISTANCE BY MEANS OF INTERLATA FACILITIES.

In its Petition, U S WEST explained that it provides all its directory assistance services, including National Directory Assistance, through centralized operator centers and databases: U S WEST does not have an operator center or a directory assistance database in each of its LATAs. Thus a directory assistance caller in one LATA will typically receive a requested number from an operator in a

¹⁴ The passage from the Conference Report cited by AT&T (at 10, n. 2) states merely that the 1996 Act includes a prohibition on interLATA services. It does not purport to define what an interLATA service might be and certainly gives no indication that Congress intended to incorporate the MFJ’s definition.

¹⁵ Cf., e.g., MFJ Section IV.I (United States v. Western Electric Co., 552 F.Supp. at 229) with Section 3(20) of the Act, defining “information service” (47 U.S.C. § 153(20)).

¹⁶ See, Section 273(h) of the Act stating that “manufacturing” has the same meaning that the term had under the MFJ. 47 U.S.C. § 273(h).

different LATA, who might obtain that number from a database in yet another LATA. AT&T and MCI claim that this serving configuration constitutes the unlawful provision of interLATA service, but only when U S WEST uses it to provide National Directory Assistance.¹⁷ AT&T and MCI are wrong.

Providing National Directory Assistance on an interLATA basis is not the provision of an interLATA service. And, even if it were, the use of interLATA facilities in this manner was previously approved under the MFJ and thus is permitted to U S WEST under Section 271(f) of the Act.

We noted above that the Act defines “interLATA service” to mean “interLATA telecommunications,” and that “telecommunications” is the transmission of information “between or among points specified by the user.” When directory assistance customers dial “1411,”¹⁸ they do not know – or care about – the location of the operator from whom they will receive the telephone numbers they request. Though directory assistance involves the transmission of information, that information is not transmitted between points specified by the directory assistance customer; rather, that information is transmitted between points selected by U S WEST. That is, U S WEST – not the directory assistance customer – is the “user:” it determines the points between which the information is to be transmitted. Thus, in offering directory assistance, U S WEST does not provide interLATA service; it uses interLATA service in offering directory assistance.

¹⁷ AT&T at 2-3; MCI at 3-4, 10-12.

In any case, the use of interLATA, "official services" circuits to provide directory assistance was approved by the MFJ Court in its review of the Plan of Reorganization.¹⁹ In that Plan, AT&T had proposed to take ownership of all interLATA official service circuits at divestiture, including those used by the BOCs in running their businesses. The Court rejected that proposal, and ordered the Plan amended to allow the BOCs to keep their official services circuits. It defined these services as "communications between personnel or equipment of [a BOC] located in various areas and communications between [BOCs] and their customers."²⁰ The Court further ruled that the BOCs' official services networks could include the circuits used to provide directory assistance.²¹ Based on that authorization, U S WEST has provided directory assistance by means of interLATA facilities since divestiture (as indeed it had for some time prior to divestiture).

AT&T and MCI do not dispute this, but they claim the MFJ Court limited the use of official services circuits to the provision of local directory assistance.²² The Court's opinion nowhere says this, of course, but AT&T and MCI wish to infer it because (they claim) the MFJ would have prohibited a National Directory Assistance offering. If the BOCs could not offer such a service, they could not use

¹⁸ In Washington and Oregon, U S WEST customers dial "1-555-1212" to receive directory assistance. U S WEST now provides National Directory Assistance in Washington using that dialing pattern and plans to do so in Oregon.

¹⁹ United States v. Western Electric Co., 569 F.Supp. 1057, 1097-1101 (D.D.C. 1983).

²⁰ Id. at 1097.

²¹ Id. at 1098, n.179.

²² In this context, "local" directory assistance includes numbers from anywhere within the caller's LATA or, if larger, the caller's NPA.

interLATA official services circuits to support or provide it, and the MFJ Court never granted them subsequent authorization to do so. Therefore, say AT&T and MCI, the use of interLATA circuits to provide National Directory Assistance was not previously approved under the MFJ.²³

AT&T and MCI would have us believe that the MFJ Court authorized the BOCs to utilize official services circuits to support only those services the BOCs were permitted to provide at the time the Court issued its official services decision. AT&T indeed tells us that the exception “was limited to those services being offered in 1983.”²⁴ In support, AT&T cites the MFJ Court’s refusal to allow the BOCs to provide time and weather services over official services,²⁵ and its conclusion that Bell Atlantic could not use interLATA official service circuits to connect a customer “gateway” to an information service platform.²⁶ But these examples involved BOC attempts to use official service circuits in ways not contemplated by the Court’s description of official services: neither service had any relationship to the provision of telephone service. For example, the Court ruled that time and weather “do not properly fall within the four basic categories of ‘official services’ . . .”²⁷ Nonetheless, the Court modified the MFJ to allow the BOCs to provide time and weather on an interLATA basis.²⁸

²³ MCI at 7-10; AT&T at 4-8.

²⁴ AT&T at 6-7.

²⁵ United States v. Western Electric Co., 578 F.Supp. 658, 661 (D.D.C. 1983).

²⁶ See, United States v. Western Electric Co., 907 F.2d 160 (D.C. Cir. 1990).

²⁷ United States v. Western Electric Co., 578 F.Supp. at 661.

²⁸ Id.

By contrast, the present proceeding involves U S WEST's use of its official services network to support National Directory Assistance, just as it has used that network to provide directory assistance all along: customers dial the appropriate number, and they are connected to an operator center in a different LATA to obtain a telephone number. What has changed is that this function now supports a broader service: customers may now obtain nationwide numbers instead of merely local (intraLATA or intra-NPA) numbers.

The MFJ Court never suggested anywhere that the BOCs could not use their official services networks to support services initially prohibited to them, but subsequently allowed through waiver or modification of the MFJ. As the range of services permitted to the BOCs expanded, so did their authority to use official services in support of those services. For example, in October, 1984, the MFJ Court granted U S WEST a waiver to provide directory assistance to other local exchange carriers on an NPA-wide basis, even if the NPA happened to encompass multiple LATAs.²⁹ By AT&T's logic, U S WEST could not use its official services network to provide that service, an absurd result. The situation here is not different. Perhaps the MFJ prohibited the BOCs from providing National Directory Assistance, but now that they are free to do so, Section 271(f) permits them to provide the service by means of their official services networks, just as they provide other directory assistance services. Ordinary directory assistance and National Directory Assistance do not differ in function or result; they should not differ in their serving

²⁹ United States v. Western Electric Co., CA 82-0192 (D.D.C. October 30, 1984).

configuration.

III. CONSIDERATION OF THE REQUIREMENTS OF SECTION 251 HAS NO PLACE IN THIS PROCEEDING; IN ANY CASE, U S WEST WILL MEET THE REQUIREMENTS OF THAT SECTION IN ITS PROVISION OF NATIONAL DIRECTORY ASSISTANCE.

AT&T argues that U S WEST must comply with Section 251 of the Act in providing National Directory Assistance.³⁰ That is, U S WEST must provide access to "411" dialing, database information and the National Directory Assistance service itself for purposes of resale.³¹

As explained below, U S WEST will comply with Section 251 in providing National Directory Assistance. We believe, however, that this issue has no bearing on U S WEST's Petition, which merely asks the Commission to determine that U S WEST may lawfully provide National Directory Assistance by means of interLATA facilities and the "411" access code. If a dispute arises regarding U S WEST's Section 251 compliance, the complaining party can raise it with the appropriate state commission(s).

In any event, U S WEST will meet the requirements of Section 251 in its provision of National Directory Assistance. Specifically:

- Access to "411." U S WEST will provide competitive local exchange carriers ("CLEC") access to the "411" code.³² That is, when a CLEC resells

³⁰ AT&T at 11-14.

³¹ Id. at 12. MCI (at 13-14) argues that local exchange carriers may not use "411" to provide National Directory Assistance. The Petition (at 14-15) herein demonstrated the error of that argument. In any event, as Ameritech notes (at 6-7), it has pending before the Commission a Petition for Clarification addressing this very issue.

³² As noted, U S WEST provides directory assistance to its Washington and Oregon customers via a "1-555-1212" dialing pattern. It now provides National Directory

U S WEST local service, or purchases unbundled network elements to provide local service, U S WEST will route "411" calls as directed by the CLEC.³³ (A CLEC that provides its own switching will, of course, route "411" traffic itself.)

- Access to databases. U S WEST provides other carriers access to its directory assistance database, which contains only in-region numbers. U S WEST obtains out-of-region numbers from an unaffiliated vendor. If a competing provider should wish to have this information treated as an unbundled network element, the appropriate state commission(s) will resolve the issue. In all likelihood, however, no carrier would want to obtain these listings from U S WEST. The cost to U S WEST of obtaining these numbers is what it pays its vendor; the Act entitles U S WEST to obtain a reasonable profit in addition to its costs.³⁴ Thus the price that U S WEST would charge another carrier for access to these numbers would almost certainly exceed the price that carrier could get by dealing directly with the vendor.
- Access to National Directory Assistance. U S WEST will provide National Directory Assistance to other carriers who wish to resell the service, and it will grant them a wholesale discount, as required by the Act.³⁵

IV. CONCLUSION

AT&T and MCI plainly have no wish to compete with U S WEST's National Directory Assistance. The Commission should reject their protectionist arguments and allow U S WEST to compete in this market, so that U S WEST's customers

Assistance in Washington using that dialing pattern, and plans to do so in Oregon as well. U S WEST will provide access to the "555-1212" dialing pattern just as it will to "411."

³³ In certain switch types (most notably the 1A ESS), limitations on the number of line class codes may restrict the number of CLECs who can avail themselves of this capability. CLECs who encounter this situation will still be able to resell U S WEST's directory assistance. Because U S WEST has not yet had a request for such routing, it does not know how significant this problem will be. In any case, U S WEST will replace these switches over the next few years, thus eliminating the problem altogether.

³⁴ 47 U.S.C. § 252(d)(1)(B).

³⁵ 47 U.S.C. § 251(c)(4)(A).

have the additional choice this service offers.

U S WEST's Petition and the comments it has engendered demonstrate the propriety of U S WEST's National Directory Assistance. That service does not violate the interLATA restriction in the Communications Act, and U S WEST will fully comply with the interconnection requirements of Section 251 in providing it. AT&T and MCI have not shown the contrary. The Commission thus should grant U S WEST's Petition.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 17th day of September, 1997, I have caused a copy of the foregoing **REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.** to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.



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